



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 21 1998

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the Oak Ridge Consolidation Landfill Superfund Site

FROM: Bruce K. Means, Chair
National Remedy Review Board

TO: Richard D. Green, Director
Waste Management Division
EPA Region 4

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed remedial action for the Department of Energy's Oak Ridge Consolidation Landfill in Tennessee. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

As you recall, the Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative.

The NRRB review evaluates the proposed actions for consistency with the National Contingency Plan and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; Regional, State/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

- Pre Decisional; Not for Distribution -

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. The Region will then include these recommendations in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's current delegations or alter in any way the public's role in site decisions.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for the site and discussed related issues with EPA RPM Carl Froede on April 1 and 2, 1998. Based on this review and discussion the Board generally supports the concept of an appropriately designed and sited centralized waste management facility at this site. Given the large number of potential source areas to be addressed on the Oak Ridge reservation, a centralized facility appears to be a cost-effective alternative to in-place waste disposal.

However, the information presented to the Board was not sufficient to evaluate fully the design and siting of the proposed facility. Nonetheless, the Board offers the following technical comments and recommendations:

- DOE has not yet defined waste volumes, characterized the waste to be consolidated, or identified waste acceptance criteria. Therefore, the Board cannot comment on the cost effectiveness of this proposed action at this time.
- DOE should identify the threshold volume above which a centralized waste management facility would be cost effective, factoring in the total expected volumes of waste to be generated at the site, the costs of in-place waste disposal, and the costs of offsite disposal.
- The decision to construct the proposed centralized waste management facility should not preclude the treatment of any principal threat wastes associated with individual source area cleanups.
- DOE did not identify leachate collection costs in the information package presented to the Board. These costs could significantly affect the total cost of the action, and should be addressed in the decision documents.
- The Board understands that the centralized waste management facility would be limited to accepting CERCLA waste. Should the region consider disposal of non-CERCLA waste at this facility it should first fully evaluate Resource Conservation and Recovery Act permitting requirements.

The NRRB appreciates the Region's efforts to work closely with DOE, the State, and the community to identify the current proposed remedy. The Board members also express their appreciation to the Region for its participation in the review process. We encourage Region 4 management and staff to work with their Regional NRRB representative and the Region 4/10 Accelerated Response Center at Headquarters to discuss any appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
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OERR Center Directors